## IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

**DEBORAH RUSSELL** 

**Plaintiff** 

03-22 0574

Case No	
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**JURY DEMANDED (12)** 

v.

WILLIAM C. KILLIAN, JOHN C. CAVETT, BARRY L. ABBOTT and CAVETT, ABBOTT & WEISS, PLLC

**Defendants** 

## PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S MOTION FOR LEAVE TO FILE PROTECTED CONFIDENTIAL CLIENT PRIVILEGED DOCUMENTS UNDER SEAL

Comes now, Deborah Russell, PLAINTIFF, pro se, and herewith files "Plaintiff's Memorandum of Law In Support of Plaintiff's Motion for Leave to File Protected Confidential Client Privileged Documents Under Seal", pursuant to United States District Court, Middle District of Tennessee, LR5.03 and LR7.01 (a), to file protected confidential client privileged information **UNDER SEAL** and states:

The language in the above referenced Local Rules specifically recognizes client privileged documents and communications as appropriate for filing with the Court UNDER SEAL, in order to protect client privilege.

In further support of her motion, Plaintiff incorporates by reference, as if fully set

Respectfully submitted,

Deborah Russell, PLAINTIFF, pro se P.O. Box 121333, Nashville, TN 37212 615-946-4484

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been sent via the U.S. Postal Service, postage prepaid to:

DEFENDANT William C. Killian 801 Broad Street, Suite 428 Chattanooga, TN 37402

DEFENDANT John C. Cavett 801 Broad Street, Suite 428 Chattanooga, TN 37402

DEFENDANT Barry L. Abbott 801 Broad Street, Suite 428 Chattanooga, TN 37402

DEFENDANT Cavett Abbott & Weiss, PLLC c/o Registered Agent for Service of Process

Barry L. Abbott

801 Broad Street, Suite 428

Chattanooga, TN 37402

On this  $2^{\binom{6}{2}}$  day of

2022

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